

# Exhibit B

**Affidavit of Brianna Kloostra**

I, Brianna Kloostra, state as follows:

1. My name is Brianna Kloostra.
2. I was an employee at the Vitale's restaurant located at 5779 Balsam Dr., Hudsonville, Michigan 49426.
3. I was an employee of the above Vitale's location from approximately November 2014 to September 2017.
4. I stopped working at the above Vitale's location in September 2017.
5. Maurizio LoGiudice and Giovanna LoGiudice are the owners of Vitale's Hudsonville.
6. Maurizio LoGiudice, Giovanna LoGiudice, Jorge Bradley, Mandy Tithof, and Anthony Vitale were my direct supervisors throughout my entire employment with Vitale's.
7. A POS system was used to record all hours worked for all employees of the above Vitale's location.
8. I worked as a food runner at the beginning of my employment.
9. I then switched to being a food runner and server.
10. Then I worked just as a server.
11. Sometime between March or April of 2015 to approximately the end of 2016 I worked as a bartender and server.
12. I worked as a manager and bartender from approximately the end of 2016 to the end of my employment in September 2017.
13. When I was a table runner I was compensated at approximately a rate of \$5.50 per hour.
14. When I was a server I was compensated at a rate of approximately \$4 per hour.
15. When I was a bartender I was compensated at a rate of approximately \$4 per hour.
16. When I was a manager I was compensated at a rate of approximately \$15 per hour.
17. At all times my rate of pay was set by Mandy Tithof, Giovanna LoGiudice, and/or Maurizio LoGiudice.
18. For all different job titles I held, my hours varied greatly per week.
19. On average, I worked around fifty (50) to fifty-five (55) hours per workweek.
20. On occasion I worked more than sixty (60) hours per workweek.
21. Mandy Tithof and Giovanna LoGiudice typically made my work schedule.
22. The POS system could be internally changed to reflect different hours than those actually worked.
23. A supervisor would edit the POS system to show only the first forty (40) hours worked before sending the hours worked to the payroll provider.
24. I was paid for the first forty (40) hours worked via payroll check or direct deposit, on a weekly basis.
25. I was paid for any and all hours over forty (40) per workweek in cash, on a weekly basis.

- 26. I was paid for any and all hours over forty (40) per workweek at a straight time rate.
- 27. I was paid in cash by Mandy Tithof and Maurizio LoGiudice.
- 28. When I was paid in cash, it was typically handed to me in the office.
- 29. At times, I may have been handed cash at the bar.
- 30. At no times were tax withholdings deducted from the cash payments I received.
- 31. When I was first paid in cash, Maurizio LoGiudice took me into the office and told me that they pay some employees in cash for the hours they work over forty hours like me, and not to discuss this payment with other employees.
- 32. I personally know that other workers were also paid in cash and were not paid overtime for the hours they worked over 40 hours in a week.

I, Brianna Kloostra, state under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Brianna Kloostra

Executed on 7/15, 2018.